

**NAHRGANG & ASSOCIATES, P.C.**  
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**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF PENNSYLVANIA**

:  
Charles K. Nguyen : No. 19-13854  
Hien T. Nguyen :  
Debtors :  
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**CREDITOR, THO NGUYENS, AMENDED  
OBJECTION TO DEBTORS PLAN**

In addition to failing to provide for Objectors secured claim in their Plan, the Debtors also failed to include in their Plan the funds fraudulently transferred by Hien T Nguyen to her mother. Taking into account the partial repayment of \$10,000.00, those funds are in excess of \$90,000.00.

Objector believes, and avers, that such transfer occurred within 4 years of the date of filing.

Those funds, or payment in kind, must be paid to creditors through the Plan pursuant to 11 USC 1325 (a)(4) and failure to disclose the fraudulent transfer is evidence of bad faith in

violation of 1325(a)(3).

Wherefore, Objector respectfully requests that confirmation be Denied.

Respectfully submitted

*/s/ Matthew R. Nahrgang*

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Matthew R. Nahrgang,  
Attorney for Objector,  
Tho Nguyen